UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

Criminal No. 21-CR-10217-DPW

v.

OSAKPAMWAN HENRY OMORUYI OSARETIN GODSPOWER OMORUYI, Defendants

JOINT STATUS REPORT AND REQUEST TO CONTINUE INITIAL STATUS CONFERENCE

The United States of America, by and through Assistant United States Attorney Sara Miron Bloom, and the defendant through undersigned counsel, respectfully submit this status report and move this Court to grant a continuance of the time within which the trial of the charged offenses must commence and enter the amended protective order filed herewith.

On July 20, 2021, the grand jury returned an Indictment in this matter. The defendants were arraigned on July 26, 2021. This Court previously excluded the time from July 26, 2021 until the scheduled status conference on September 20, 2021.

On or about August 13, 2021, the Court entered the Protective Order agreed upon by the parties and the United States has sent out automatic discovery pursuant to that Protective Order, which included voluminous materials which were recently provided on hard drives provided by the defense. The discovery is somewhat voluminous and counsel for the defendants need seek an additional 45 days to review and consider the discovery in this case and determine whether there are any additional discovery issues or other pretrial motions.

EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT

The parties jointly request that the status conference scheduled for September 20, 2021 be

continued for approximately forty-five days, but also agree that the time period until the next status conference constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv) and Sections 5(b)(7)(A), 5(b)(7)(B) and 5(b)(7)(C)(iv) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts. The parties request that the Court exclude the time period from September 20, 2021 (the date of the scheduled status conference) through the date of the next status conference, from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv) and Sections 5(b)(7)(A), 5(b)(7)(B) and 5(b)(7)(C)(iv) of the *Plan for Prompt Disposition of Criminal Cases* for the United States District Court for the District of Massachusetts (effective December 2008), on the ground that the ends of justice served by granting the requested continuance and excluding these periods outweigh the best interests of the public and the defendant in a speedy trial.

Respectfully submitted,

ANDREW E. LELLING United States Attorney

By: s/ Sara Miron Bloom SARA MIRON BLOOM Assistant U.S. Attorney

OSAKPAMWAN HENRY OMORUYI By his attorney,

<u>s/Liam Scully</u> PETE HORTSMANN

OSARETIN GODSPOWER OMORUYI By his attorney

/s/ Liam Scully
LIAM SCULLY

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

By: s/ Sara Miron Bloom
SARA MIRON BLOOM

Assistant U.S. Attorney

Dated: September 13, 2021